



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

TNS068276  
VMJ  
PJH

JAN 17 2014

TN DEPT OF ENVIRONMENT  
AND CONSERVATION

JAN 27 2014

DIV OF WATER RESOURCES  
RECEIVED

Mr. Vojin Janjic  
Manager, Permit Section  
Division of Water Resources  
Tennessee Department of Environment  
and Conservation  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243

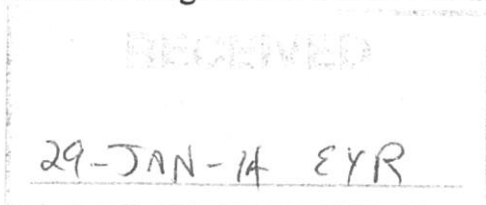
Subject: Review of Second Draft Permit for City of Memphis  
Municipal Separate Storm Sewer System  
Permit No. TNS068276

Dear Mr. Janjic:

Thank you for the opportunity to review Tennessee's second draft National Pollutant Discharge Elimination System permit for the City of Memphis Municipal Separate Storm Sewer System (MS4). The U.S. Environmental Protection Agency Region 4 has completed its review of the draft permit, received by our office via email from the Tennessee Department of Environment and Conservation (TDEC) on December 18, 2013.

As expressed in our first comment letter of August 28, 2012, the EPA found the first version of this permit to be acceptable since it contained requirements that are clear, specific, measurable and enforceable. We are pleased to see that the currently proposed permit also contains requirements that are clear, consistent with applicable regulations, and enforceable. We are very supportive of TDEC's use of the EPA's MS4 Improvement Guide to help shape the framework and concepts of the draft permit, and we find this permit to be a much improved permit over the existing one. The EPA is especially pleased with the specific requirements and milestones contained in the Total Maximum Daily Load implementation and post-construction sections of the permit, and we believe that these in combination with the other permit requirements will help to improve the water quality of the City of Memphis' receiving waters over time.

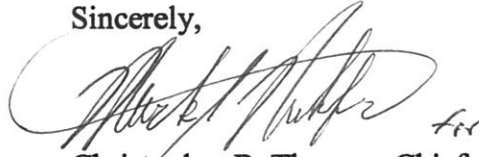
Since this is the second iteration of this draft permit, the EPA hopes that any significant comments have already been resolved. Should TDEC make any more significant changes to the draft permit, the EPA requests a copy of the permit before it is finalized in accordance with Section IV.B.6.c. of the Memorandum of Agreement between Tennessee and EPA.





We look forward to the final reissuance of this permit, especially since it has been administratively continued for quite some time. If you have any questions, please call me at (404) 562-9459 or have your staff contact Ms. Mary Kuo at (404) 562-9847.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Thomas", with a small "for" written to the right.

Christopher B. Thomas, Chief  
Pollution Control and Implementation Branch  
Water Protection Division

cc: Public Notice Coordinator  
TDEC